ARCIA

PO Box 1371, Mitcham North

Victoria 3132

The Manager

Spectrum Licensing Policy Section

Australian Communications and Media Authority

PO Box 13112

Melbourne Vic 8010

9 July 2025

Reference: Consultation paper – Changes to CB radio arrangements

The ARCIA committee have had an involvement in the CB industry for many years, with the main suppliers of products to this sector being members and strong supporters of our association. With this background we can advise that in general terms we agree with the proposals put forward by the ACMA in this consultation paper. We concur that the Class Licence has proven to be fit for purpose and with a few recommendations for improvement, we believe that it can continue to guide this sector the communications industry for years to come.

When the Class Licence was reviewed over ten years ago it was felt that there were valid reasons for the CB Class Licence to have some exceptions to recognise that the implementation of 12.5 kHz channel spacing might cause inconvenience and concerns to some existing user segments. In principle ARCIA agreed with these exclusions on the understanding that they would be corrected when the licence would be reviewed as part of the routine ‘Sunsetting’ period after ten years. Philosophically it is our position that the segments of the UHF CB band that have not been converted to 12.5 kHz channel spacing should now be changed as part of the renewal of the licence.

We can see no technical reason as to why this should not take place, and as most equipment supplied into the market for the past ten years would have been equipment deigned and supplied under the 12.5 kHz guidelines equipment replacements would most likely already comply. Further, the capital cost of any of the equipment for the UHF CB band is relatively low and so the depreciated value of any equipment would now be virtually zero, hence we see no financial imperative for the change to 12.5 kHz channel spacing being deferred again.

If there are valid cases for specific exemptions, then we would strongly suggest that they should be done on a case-by-case basis rather than continuing to leave the non-standard situations as part of the class licence. In line with this philosophy, we would also suggest that the conditions for repeater services in the UHF CB band under FAP9 should also be adjusted to determine that channel spacings in the relevant repeater services should also be made on the basis of 12.5 kHz channelling.

With regard to the item specifically mentioned in the consultation paper –

1. Frequency modulation use in the HF band

ARCIA has no concerns with this change and we believe that with little use of the HF band in the modern world changing to FM might see some better use of that portion of the spectrum.

1. Initiating contact on HF channels 11 and 16 and UHF channel 11

We agree with the ACMA position on this item.

1. Consent of an inspector about altering a CB radio

We agree with the ACMA position on this item.

1. Prohibition on certain ‘on-air’ conduct

Although we agree in general, the fact that the condition remains in the reviewed licence might help as a deterrent in some cases. We understand that in many aspects it is a ‘toothless tiger’ with regard to the outcomes, but any deterrent should be retained.

1. Identification of a CB radio – additional duty cycle

We support this change to bring it into line with modern technology.

1. Directions given by inspectors and other persons

We support the proposed ACMA position.

1. A CB radio connected to a telecommunications network

We support the proposed ACMA position.

1. Use of Voice over Internet Protocol (VoIP) applications

We support the proposed ACMA position.

1. Formatting and other drafting changes

We support the proposed ACMA position.

With regards to the other matters for comment not reflected in the CB class licence 2025

1. Emergency communications on HF channel 9 and UHF channels 5 and 35

We believe that the present situation should remain as is, because we understand that the Public Safety Agencies do utilise CB for disseminating information during times of emergency and so the channels should remain as being for emergency use. The only area of concern is that in the wording of the Class Licence wording should be used to avoid giving the impression to users that the ‘Emergency channels’ are monitored in any ongoing way and so they are NOT a reliable means of calling for help if required.

1. Channel arrangements for data transmission (telemetry and telecommand)

As indicated above, our position is that ALL segments of the spectrum should now be converted to 12.5 kHz channel spacings under the new Class Licence. One of the original reasons for leaving channels 22 and 23 as wider emission 25 kHz channels was that the data rate was deemed to be too slow in a 12.5 kHz channel. However, with modern modulation techniques greater speeds can be achieved so that is no longer an issue.

1. Channels 22 and 23

As above

1. Channels 61, 62 and 63

We are not able to offer any input to this part of the discussion, other than to say that the usage of UHF CB has changed quite significantly over the past decade and demand for channels has changed to major users now being the civil construction industry and some minor security users, plus the travelling public who are mainly using limited numbers of channels. We would suggest that the equipment suppliers may be able to give better indications, however, we would think that allocating these channels to telemetry type operations would be unlikely to impact on other users or channel availability. Certainly, having 5 channels to choose from instead of just two should allow greater reuse of these systems in a denser fixed situation such as farming and should reduce the chances of causing transmission clashes and interference to what is normally a one way service.

As always, we are happy to discuss anything contained within this letter, or any other aspect of equipment regulations, we are very much aware that the standard of equipment regulations has a very direct bearing on being able to maintain the spectrum as being fit for purpose for all users, one of the important aims of the ACMA.

Yours sincerely,

Australian Radio Communications Industry Association (ARCIA) Inc.